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**MEMORANDUM ENDORSED**

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October 10, 2023

**VIA CM/ECF**

Hon. Gregory H. Woods  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 2260  
New York, New York 10007

Re: *Chicago Bridge & Iron Company N.V., et al., v. Refinera de Cartagena S.A.S.*, Case No. 1:23-cv-04825-GHW

Dear Judge Woods:

We represent Petitioners Chicago Bridge & Iron Company N.V. and CB&I UK Limited in connection with the above-referenced action (together, “Petitioners” or “CB&I”). We write on behalf of CB&I pursuant to Your Honor’s Individual Practices to request the cancellation of the hearing on Respondent’s Motion for Pre-Judgment Attachment, presently scheduled for October 13, 2023 at 2:00 p.m., and to advise the Court of the entry of the Order Granting Provisional Relief Pursuant to Section 1519 of the Bankruptcy Code (“Stay Order”), attached as Exhibit A.

The Stay Order was entered on October 10, 2023 by the United States Bankruptcy Court for the Southern District of Texas in the matter captioned *In re CB&I UK Ltd., et al.*, Case No. 23-90795 (CML). The Order establishes a stay of proceedings that is substantively equivalent to section 362 of the Bankruptcy Code with respect to the Debtors (Petitioners here) and the Debtor’s property within the territorial United States. *See Ex. A ¶ 1(2).* This stay extends to:

“the commencement or continuation ... of, any judicial, administrative, or any other action or proceeding involving or against the Debtors or their assets or proceeds thereof, or ... [to] enforce any ... arbitration award against the Debtors or their assets or proceeds thereof, or to attach to or exercise any control over the Debtors’ assets located in the United States ....”

*Id. ¶ 1(2)(i).* The Stay Order applies to the above-captioned matters pending before this Court—Respondent’s Motion for Pre-Judgment Attachment, as well as the underlying cross-motions for

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vacatur and confirmation of the arbitration award—and Petitioners accordingly respectfully ask that the Court stay these proceedings pending further order of the Bankruptcy Court. We have met-and-conferred with counsel for Respondent before submitting this letter.

We thank the Court for its consideration of this matter, and we are available to answer any questions or provide additional information.

Respectfully submitted,

*/s/ Michael F. Williams*  
Michael F. Williams, P.C.

Cc: All counsel of record

In light of the stay order entered on October 10, 2023 by the U.S. Bankruptcy Court for the Southern District of Texas, this case is stayed pending further order of the Bankruptcy Court. The hearing scheduled for October 13, 2023 is canceled. The Clerk of Court is directed to note the stay of this case on the docket and to terminate the motions pending at Dkt. Nos. 38 and 72.

SO ORDERED.

Dated: October 10, 2023  
New York, New York

  
GREGORY H. WOODS  
United States District Judge